

AFFIDAVIT
of
PAUL A. YORK
SPECIAL AGENT
UNITED STATES SECRET SERVICE

I, Paul A York, after being duly sworn depose and state:

1. I am a Special Agent with the United States Secret Service (USSS) assigned to the Kansas City Field Office (KCM). I have been a Special Agent with the USSS for seventeen months. My duties as a Special Agent, among others, include the investigation of threats against the President of the United States. For the past year, I have participated in investigations involving the aforementioned criminal acts. As a Special Agent, I have received training in the enforcement of laws under Title 18, United States Code, Section 871 - threats against the President.

2. I am currently involved in an ongoing investigation involving, among others, CAMERON JAMES STOUT, for criminal violations of Title 18, United States Code, Section 871.

3. This affidavit is based on my own personal knowledge as well as information provided to me by other law enforcement agencies and officers. This affidavit is submitted for the limited purpose of establishing probable cause so I have not included each and every fact known to me regarding the instant investigation.

4. On March 13, 2015, Morgan County Deputy Kyle Towles contacted the USSS Chicago Duty Desk after hours, and advised that a credible confidential informant (CI) had contact with someone with Aryan Nation affiliation who had a serious conversation with the CI about wanting to shoot the President of the United States.

5. I contacted Deputy Towles at (573) 789-1234 at approximately 6:00 p.m. on March 13, 2015. Deputy Towles told me that the CI had contacted him earlier that day regarding his concern over a conversation he had with CAMERON JAMES STOUT, a white male, DOB: April 26, 1990, who is allegedly trying to solicit the CI for a rifle and assistance in his plan to shoot the President. The CI stated that STOUT has indicated he plans to execute his plan in the next few weeks. The CI indicated this conversation took place on or about March 12, 2015.

6. Deputy Towles told me that the CI is a former Aryan Nation member who has been reliable and credible throughout the time Deputy Towles worked with him. The CI has prior felony convictions, but is not currently on probation or parole. The CI stated that he first met STOUT when STOUT and another individual were fishing near the CI's property during the afternoon of March 12, 2015. Either STOUT or the other individual made a rude hand gesture towards the CI as he was driving by where STOUT and the other individual were fishing, which prompted a confrontation between the three. The CI, STOUT and the other individual calmed down, and the CI invited STOUT and the other individual to the CI's shop to work on STOUT's ATV. Later, they ate dinner at the CI's house and drank beer. The CI initially believed STOUT's nickname was "Tony," but later learned that his first name was CAMERON.

7. During the evening, the CI's background as a former Aryan Nation member was discussed, and STOUT mentioned his dislike of the President. After STOUT's friend left, the conversation then moved to a more specific discussion of STOUT's willingness to shoot the President. The CI told Deputy Towles that STOUT said he was going to kill the President and that he was serious. According to the CI, STOUT indicated that he did not have a high-powered rifle, and needed to obtain one. The CI told STOUT he could put him in contact with a high-ranking member of the Aryan Nation organization to assist him in obtaining a rifle and to

provide STOUT with information which would assist him. A portion of their conversation was recorded by the CI's girlfriend, during which STOUT indicated, "I don't wanna annihilate anybody, I wanna fuckin' change America," then continued, "If you had contact with the people that you say you had contact with, I could kill the President of the United States, and then we storm Washington, and then we take over the country that our forefathers created."

8. On March 14, 2015, the CI again met with STOUT, who continued their conversation about STOUT shooting the President while they worked on four wheel ATVs. The CI stated that STOUT uses a four wheel ATV as his mode of transportation: I have confirmed that STOUT does not currently have a vehicle or a Missouri driver's license, and his Kansas driver's license has been revoked. The CI told Deputy Towles that STOUT has identified locations to shoot from at the White House and the church that the President attends. The CI further stated that STOUT had researched the average wind speeds in the area, and discussed the type of bullet and ballistics he planned to use to carry out his plan. A portion of this discussion was also recorded by the CI's girlfriend. STOUT stated, "I got the shit mapped out, and I know that it can happen and I know that I can get away with it, but I know that it needs to be executed a certain way." STOUT expressed his dislike of President Obama by stating, "That nigger shouldn't be President." Further along in their conversation STOUT told the CI that "some of my best friends have been niggers." When the CI questioned whether he was serious about the plot, STOUT stated, "I'll drive. I have it mapped out." STOUT also indicated that the CI couldn't be the shooter because he has a family.

9. STOUT drew two diagrams of the Washington DC area and his shooting locations that he had identified through research on the internet, which he gave to the CI. One of the drawings showed a 2-lane road identifying the presidential motorcade going 35 mph, and a

building 100 yards from the road, from where STOUT intended to take his shot. The diagrams also listed “270” (the rifle caliber), “120 gr” (the grain of ballistic tipped bullets), “bar 26%” (the average barometric pressure in Washington, DC), “hum 86%” (the average humidity in Washington, DC), and a compass at the bottom of the page with an extra line and “10mph” (the average wind speed and direction for that specific location in Washington, DC) (*see* Attachment A). The other diagram showed the White House steps with a stick figure of the President, and a location approximately “600” yards away from which STOUT could shoot the President (*see* Attachment B).

10. The evening of March 15, 2015, Deputy Towles and the CI met so that Deputy Towles could obtain the diagrams drawn by STOUT from the CI, which he then logged into evidence. During their meeting, the CI told Deputy Towles that STOUT had thought about trying to shoot the President when he recently visited Lawrence, Kansas, in January 2015, but his plans fell through. The CI told Deputy Towles that STOUT told the CI that he actually owns a .270 caliber Weatherby rifle with a high-powered scope which STOUT had loaned to another person, but that STOUT now has the rifle back and plans to use it commit his crime. The CI stated that STOUT has other weapons such as .22 caliber rifles, shotguns, and is trying to get access to a 9mm pistol. The CI told Deputy Towles that STOUT claimed he won’t give up without a fight but he wants to escape after the crime, and he further stated he hates law enforcement officers. The CI again spoke to STOUT about an individual (UC) who is involved in the Aryan Nation and may be able to help STOUT. STOUT is reaching out to the UC through the CI to provide support in finding safe houses and a vehicle to escape Washington DC after he has committed the crime.

11. STOUT currently lives with his father at 5099 Cripple Creek Lane, Stover, Morgan County, Missouri. STOUT's father is Matthew Stout, who is retired from the Army. Deputy Towles stated that Matthew Stout is allegedly a heavy drinker, and keeps to himself on his property.

12. On March 16, 2015, the CI drove by the mailboxes down the road from STOUT's residence on Cripple Creek Lane, Stover, Morgan County, Missouri. STOUT was at his mailbox and waived down the CI. The CI drove STOUT to his residence which is located at 5099 Cripple Creek Road. The residence is a single story residence with white siding, a brown shingled roof, and an open carport. The residence is the first residence on the right side of Cripple Creek Lane coming from Ivy Bend Road. The CI went inside the residence and met with STOUT and his father. They had a beer, and the CI observed a long gun by the door which did not appear to be a .270 caliber Weatherby rifle with a high-powered scope.

13. At approximately 6:00 p.m. on March 16, 2015, at the direction of law enforcement, the CI met with STOUT at the CI's shop located in Morgan County, Missouri, to discuss meeting with the CI's superior in the Aryan Nation. In a recorded conversation, STOUT acknowledged their conversation on March 12, 2015. The CI asked STOUT if he brought his gun and he said it was at his house. STOUT said he did not trust the accuracy of his scope, and the CI said that his superior can help with that. STOUT said he is not that good of a shot from a distance. STOUT told the CI that if he (the CI's superior) can tell me I can get away, I will do it myself.

14. The CI and STOUT agreed to meet back at the CI' shop at 10:30 a.m. on March 17, 2015, to meet the CI's superior.

15. On March 17, 2015, at approximately 11:00 a.m., STOUT arrived at the CI's shop and met with the CI and the UC, purporting to be the CI's superior. The meeting was recorded. USSS SA John Seubert monitored the conversation, and told me that STOUT stated that his plan was to set up at Crown Center in Kansas City, Jackson County, Missouri, and to shoot the President the next time he comes to Kansas City. STOUT was wanting the UC to provide him with transportation to and from Kansas City. STOUT stated that he was a competent shot up to 200 yards. The UC asked STOUT if it was STOUT's plan to shoot the President, and STOUT replied "Yes." STOUT also told the UC that he had done research for his plan on his home computer.

16. On March 14, 2015, an NCIC/NLETS check of STOUT was run, which reflected that STOUT has a criminal record but no active warrants. STOUT has prior arrests for driving under the influence of alcohol, driving on a suspended license, reckless driving, and theft, all of which were misdemeanor offenses.

14. A records check on March 14, 2015, disclosed that STOUT is not of record with the USSS.

15. The facts set forth in this affidavit are true and correct to the best of my knowledge and belief.



PAUL A. YORK, Special Agent
United States Secret Service

SWORN TO and subscribed before me on this 17th day of March, 2015.



MATT J. WHITWORTH
United States Magistrate Judge